

REMARKS

Claims 1-10 remain pending in the application.

The Applicant respectfully requests that the Examiner reconsider earlier rejections in light of the following remarks. No new issues are raised nor is further search required as a result of the changes made herein. Entry of the Amendment is respectfully requested.

Objection to Figures

The Examiner again alleged that Applicant's Figs. 1 and 2 should be labeled as Prior Art in the Response to Arguments section of the Office Action. The reasoning the Examiner gave now is that Flynn allegedly discloses the same features. The Applicant respectfully disagrees.

Nevertheless, whether Applicant's figure is to be labeled as prior art is not based on whether some prior art discloses the same features. If prior art discloses claimed featurees, then those claims would presumably be rejected over the prior art. The basis of whether to label a figure as prior art is based on if the Applicant discloses that figure as prior art. Applicant clearly discloses Figs. 1 and 2 as embodiments of invention.

Objection of Claim 1

The Office Action objected to claim 1 for allegedly failing to spell out "LCS".

Claim 1 is amended herein to spell out the recited "LCS". Applicant respectfully requests that the objection of claim 1 be withdrawn.

Claims 1-10 over Flynn in view of Fineberg

In the Office Action, claims 1-10 were rejected under 35 U.S.C. §103(a) as allegedly being obvious over U.S. Patent Application Publication No. 2004/0229632 to Flynn et al. ("Flynn") in view of U.S. Patent Application Pub. No. 2003/0196105 to Fineberg ("Fineberg"). The Applicant respectfully traverses the rejection.

Claims 1-10 recite a system and method of establishing a roaming interface between a home Location Services (LCS) manager of a home wireless carrier network and a visited LCS manager of a currently visited wireless carrier network; and directing IP connectivity over the roaming interface between a home LCS manager and a visited LCS manager over an Internet, through a firewall in a home wireless carrier network and through a firewall in a visited wireless carrier network.

The Examiner acknowledged that Flynn fails to disclose directing IP connectivity over a roaming interface between a home LCS manager and a visited LCS manager through a firewall in a home wireless carrier network and through a firewall in a visited wireless carrier network (See Office Action, page 4). The reason Flynn fails to disclose directing IP connectivity over an Internet, through a firewall in a home wireless carrier network and through a firewall in a visited wireless carrier network is that Flynn fails to disclose or suggest a need for EITHER an IP connection OR a firewall to implement his invention. Thus, there would no suggest to modify Flynn with a IP connection OR a firewall, much less with an IP connection AND a firewall. The Examiner has failed to address much less refute this point that was made in the Applicant's Amendment filed May 30, 2006.

Fineberg appears to disclose a system and method for connecting a Remote User of a first company to an extranet of a second company (See Abstract). As the Examiner acknowledged, Fineberg discloses a system and method of allowing a roaming user to access a company's intranets (see Office Action, page 4). However, Fineberg lack any applicability to communications between a home LCS manager and a visited LCS manager, much less disclose

or suggest use of an Internet to direct IP connectivity between a home LCS manager and a visited LCS manager. Thus, Fineberg cannot make up for the acknowledged deficiencies in Flynn since failing to disclose the acknowledged deficiencies in Flynn, i.e., the acknowledged deficiencies in Flynn being a very specific communication and a very specific type of connection between a home LCS manager and a visited LCS manager.

Moreover, the Examiner is alleging that it would have been obvious to modify Flynn because "Fineburg teaches" (see Office Action, page 5). However, the Examiner has still failed to provide motivation why one skilled in the art would modify the primary reference. Simply stating it would have been obvious to modify Flynn because the secondary reference discloses various features completely ignores why it would have been obvious to modify the primary reference Flynn. The Examiner has still failed to provide a reason why it would have been obvious to modify Flynn with any features, much less the acknowledged deficiencies in Flynn.

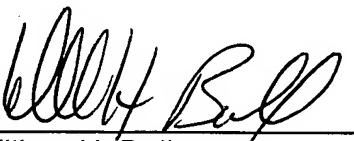
The Examiner has still failed to provide a single reference or a combination of references that disclose or suggest Applicant's claimed very specific communication and very specific type of connection between a home LCS manager and a visited LCS manager. Thus, Flynn modified by the disclosure of Fineberg would STILL fail to disclose or suggest directing IP connectivity over the roaming interface between a home LCS manager and a visited LCS manager over an Internet, through a firewall in a home wireless carrier network and through a firewall in a visited wireless carrier network, as recited by claims 1-10.

Accordingly, for at least all the above reasons, claims 1-10 are patentable over the prior art of record. It is therefore respectfully requested that the rejection be withdrawn.

Conclusion

All objections and rejections having been addressed, it is respectfully submitted that the subject application is in condition for allowance and a Notice to that effect is earnestly solicited.

Respectfully submitted,



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